

1
2
3
4
5
6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 CITY OF ISSAQAH, a municipal
10 corporation,

11 Plaintiff,

12 v.
13 ORA TALUS 90, LLC, a Delaware limited
14 liability company; and RESMARK EQUITY
15 PARTNERS, LLC, a Delaware limited
16 liability
17 company

18 Defendant.

Case No.: C18-910 RSM

**STIPULATED MOTION AND ORDER
TO EXTEND CERTAIN DEADLINES**

17 The parties respectfully submit this joint request for an Order to Extend Certain
18 Deadlines pursuant to LCR 16(b)(5).

19 The parties have agreed to mediate all issues in dispute between the parties to this
20 lawsuit and third parties who will be brought into the case before Christopher J. Soelling on
21 October 24, 2018. The parties believe that it would be most efficient to extend certain deadlines
22 so that they may focus on the mediation rather than the demands of initial disclosures and the
23 discovery conference. In addition, the defendants seek more time to file their amended answer,
24

1 third-party complaint, and counterclaim in order to coordinate that filing with certain other third
2 parties that have subrogation rights.

3 Accordingly, the parties seek extension of the following deadlines:

4 **Service of Summons and Complaint on a Nonparty by Defendants**

5 Current deadline: September 6, 2018

6 Requested deadline: September 26, 2018

7 **Service and Filing of an Amended Answer and Counterclaim by Defendants**

8 Current deadline: September 6, 2018

9 Requested deadline: September 26, 2018

10 **Fed. R. Civ. P. 26(f) Conference**

11 Current deadline: September 20, 2018

12 Requested deadline: October 31, 2018

13 **Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

14 Current deadline: September 27, 2018

15 Requested deadline: November 7, 2018

16 **Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P.
17 26(f) and Local Civil Rule 26(f)**

18 Current deadline: September 20, 2018

19 Requested deadline: October 31, 2018

1 The parties respectfully request the foregoing relief.

2 DATED this 28th day of August, 2018

3 SKELLENGER BENDER, P.S.

4 By: s/Terence J. Scanlan

5 By: s/Patricia A. Robert

6 Terence J. Scanlan, WSBA #19498

7 Patricia A. Robert, WSBA # 46716

8 1301 – 5th Avenue, Suite 3401

9 Seattle, WA 98101-2605

10 Telephone: 206-623-6501

11 Facsimile: 206-447-1973

12 Email:

13 tscanlan@skellengerbender.com

14 Email:

15 probert@skellengerbender.com

16 Attorneys for Plaintiff City of Issaquah

17 HARRIGAN LEYH FARMER & THOMSEN LLP

18 By: s/Arthur W. Harrigan, Jr.

19 By: s/Tyler L. Farmer

20 By: s/Kristin E. Ballinger

21 Arthur W. Harrigan, Jr. WSBA #1751

22 Tyler L. Farmer, WSBA #39912

23 Kristin E. Ballinger, WSBA #28253

24 999 Third Avenue, Suite 4400

1 Seattle, WA 98104

2 Telephone: (206) 623-1700

3 Facsimile: (206) 623-8717

4 Email: arthurh@harriganleyh.com

5 Email: tylerf@harriganleyh.com

6 Email: kristinb@harriganleyh.com

7 GLASER WEIL FINK HOWARD AVCHEN &
8 SHAPIRO LLP

9 By: s/Cynthia M. Cohen

10 Cynthia M. Cohen, Admitted Pro Hac Vice

11 333 S. Hope Street, Suite 2610

12 Los Angeles, CA 90071

13 Telephone: (310) 553-3000

14 Facsimile: (310) 556-2920

15 Email: ccohen@glaserweil.com

16 Attorneys for Defendants ORA Talus 90, LLC and
17 Resmark Equity Partners, LLC

ORDER

IT IS SO ORDERED this 29th day of August 2018.

B.M.J.

RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

SKELLENGER BENDER, P.S.

By: s/Terence J. Scanlan

By: s/Patricia A. Robert

Terence J. Scanlan, WSBA #19498
Patricia A. Robert, WSBA # 46716
1301 – 5th Avenue, Suite 3401
Seattle, WA 98101-2605
Telephone: 206-623-6501
Facsimile: 206-447-1973
Email:
tscanlan@skellengerbender.com
Email:
probert@skellengerbender.com

Attorneys for Plaintiff City of Issaquah

HARRIGAN LEYH FARMER & THOMSEN LLP

By: s/Arthur W. Harrigan, Jr.

By: *Tyler L. Farmer*

By: s/Kristin E. Ballinger

Arthur W. Harrigan, Jr. WSBA #1751
Tyler L. Farmer, WSBA #39912
Kristin E. Ballinger, WSBA #28253
999 Third Avenue, Suite 4400
Seattle, WA 98104
Telephone: (206) 623-1700
Facsimile: (206) 623-8717
Email: arthurh@harriganleyh.com
Email: tylerf@harriganleyh.com
Email: kristinb@harriganleyh.com

GLASER WEIL FINK HOWARD AVCHEN &
SHAPIRO LLP

By: *s/Cynthia M. Cohen*

Cynthia M. Cohen, Admitted Pro Hac Vice
333 S. Hope Street, Suite 2610
Los Angeles, CA 90071
Telephone: (310) 553-3000
Facsimile: (310) 556-2920
Email: ccohen@glaserweil.com

Attorneys for Defendants ORA Talus 90, LLC and
Resmark Equity Partners, LLC